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**COUNTY OF
COLUSA
TRANSPORTATION
COMMISSION**

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November 20, 2014

Mr. Ken Alex, Director

Governor's Office of Planning and Research

1400 Tenth Street

Sacramento, CA 95814

**RE: Preliminary Discussion Draft of Proposed Changes to the California Environmental
Quality Act Guidelines Implementing Senate Bill 743**

Dear Mr. Alex:

The Colusa County Transportation Commission (CCTC) submits the following comments in response to the *Preliminary Discussion Draft of Updates to the California Environmental Quality Act (CEQA) Guidelines Implementing Senate Bill 743 (Steinberg, 2013)* prepared by the Governor's Office of Planning and Research (OPR). Colusa County is one of the many rural counties in California that would be significantly affected by the proposed draft updates. With an area of over 1,150 square miles and a population of less than 22,000 the automobile is the primary mode of transportation for the traveling public, outside of recreational activities.

The CCTC understands the rationale for developing an alternative metric for potential transportation impacts that differs from traditional Level of Service (LOS) criteria. In addition, we appreciate the need to balance infill and new development with sustainable, transit-oriented growth that helps reduce greenhouse gas (GHG) emissions. Our concern is the selection of Vehicle Miles Traveled (VMT) as an alternative to LOS in rural areas such as ours.

In a letter to you from Mr. Jerry Barton, dated November 20, 2014 the suggestion is made to conduct case studies and perform additional research in rural areas. We strongly support this recommendation as it would help guide the development of policy that would make more sense for rural areas. Although there is transit service within the county, and we do have bicycle facilities, the automobile remains the dominant mode of travel. To require rural areas to use VMT as a basis for determining impacts would have significantly disproportionate results than for urban areas. For example, the following table compares survey data from the CA Household Travel survey, Union City's Transit Passenger Survey, and estimates based on observations from Colusa County.

Table 1: Travel Mode Comparison for Rural, State Average, and Urban Areas

Travel Mode	Rural Area ¹	CA Average ²	Urban Area ³
Vehicle	90%	76%	43%
Non-Motorized	7%	18%	21%
Transit	2%	3%	34%
All other	1%	3%	2%

Source: ¹ Estimates from observed travel and informal surveys in Colusa County.
² 2010 – 2012 CA Household Travel Survey
³ Union City Transit 2013 Passenger Survey

As shown in the table, the automobile as a travel mode choice can be as much as 47% greater in rural areas than in urban areas. This data shows the difficulty in applying density-rich evaluation criteria (i.e VMT) in rural areas that have significantly different geographic characteristics and travel mode choices.

Based on this information, it is critical to acknowledge the inherent travel behavior differences between rural and urban areas, and how a VMT vs. LOS evaluation metric would impact each area differently. In addition, it is important to recognize these differences as a means of developing GHG reduction policies. We encourage you to work with the RCTF, Rural County Representatives of California, California State Association of Counties, and the California League of Cities to develop a pilot program to determine the applicability of VMT analysis in rural areas before implementing it statewide.

Similar to many rural counties, Colusa County does not have a trip-based travel demand model. As such, mitigation measures suggested by the new policy would not provide accurate assessments of potential travel-based impact determinations, and thus the ability to effectively evaluate project-level impacts and GHG reduction measures.

The CCTC also has concerns in relation to the application of the proposed use of a regional average VMT by land use type as a threshold of significance in rural areas. In rural counties, the regional average VMT does not account for the distinct differences between incorporated cities and the geographically disperse unincorporated rural communities. We suggest that you consider a more flexible approach that allows lead agencies to set the appropriate significant threshold for defined geographic areas.

With regard to the proposal to include induced demand as a significant impact under CEQA, there needs to be more substantial evidence developed to justify including rural capacity increasing projects, and to determine where to draw the line in relation to impacts versus benefits. Each project and location is unique. When applying induced demand analysis in a rural county you will find that, due to sparse population, geography and terrain, the travel patterns tend to be more established and static as compared to urban areas. Adding capacity to a roadway in a rural area would not necessarily result in a large increase in trips being made on the new facility.

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Given the low level of transit availability and difficulty of biking or walking over long distances, there is very little existing non-auto travel for the induced demand to "come from." In addition, due to the longer distances traveled, studies show that in rural areas drivers tend to combine most of their shopping, banking, and other required activities as a part of one trip (trip chaining) versus multiple trips. Key corridors in rural areas generally are the most direct route between locations and if allowed to degrade as congestion increases, drivers will most likely look for alternative routes that are not as direct and result in higher VMT. It should be noted that the current mode split for alternative modes of transportation in rural areas is generally low and the longer distances between destinations and terrain tend to limit bicycling and walking as viable alternatives to the automobile. Due to funding constraints, transit in rural areas, although it is available, is limited in its coverage and frequency and is not a convenient alternative to the automobile. Moreover, expanding transit services is often not possible within current funding levels.

The CCTC appreciates the opportunity to comment on the Preliminary Discussion Draft and looks forward to additional opportunities to work collaboratively with OPR to address these concerns as you move toward the adoption of the guidelines.

Respectfully,



Kim Dolbow Vann
Chair, Colusa County Transportation Commission

CC: Regional Council of Rural Counties
California Transportation Commission
Rural Counties Task Force
California State Association of Counties